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23 **UNITED STATES DISTRICT COURT**
24 **DISTRICT OF NEVADA**

25 ADDISON HEMPEL, CASSIDY
26 HEMPEL, CHRISTINE HEMPEL, HUGH
27 HEMPEL, and SOLUTION
28 THERAPEUTICS,

Plaintiffs,

v.

CYDAN DEVELOPMENT, INC.,
CYDAN II, INC., VTESSE, INC.,
SUCAMPO PHARMACEUTICALS,
INC., and DOES I-X and ROE
CORPORATIONS I-V, inclusive,

Defendants.

Case No. 3:18-cv-00008-MMD-VPC

JOINT STATUS REPORT

1 Plaintiffs Addison Hempel, Cassidy Hempel, Christine Hempel, Hugh Hempel, and
 2 Solution Therapeutics (“Plaintiffs”) and Defendants Cydan Development, Inc., Cydan II, Inc.,
 3 Vtesse, Inc., and Sucampo Pharmaceuticals, Inc. (“Defendants”) submit this Joint Status Report,
 4 as directed by the Court during the April 16, 2018 Case Management Conference. ECF No. 27.
 5 Specifically, the Court directed counsel “to meet and confer regarding an amended discovery plan
 6 and scheduling order, a protocol for electronically stored information, and any protective orders
 7 that may be necessary in this case. Counsel shall then file a status report concerning these items
 8 by no later than Friday, May 18, 2018.” *Id.*

9 The parties met and conferred as directed on May 16, 2018.

10 Regarding the discovery plan and scheduling order, the parties have agreed to amend the
 11 deadlines as follows:

| | <u>Old Deadline:</u> | <u>New Deadline:</u> |
|--|-----------------------------|-----------------------------|
| 13 Discovery cut-off: | September 15, 2018 | November 16, 2018 |
| 14 Amended pleadings/added parties: | June 17, 2018 | August 17, 2018 |
| 15 Disclosure of initial expert witnesses: | July 17, 2018 | September 17, 2018 |
| 16 Disclosure of rebuttal expert witnesses: | August 17, 2018 | October 17, 2018 |
| 17 Dispositive motions: | October 15, 2018 | December 14, 2018 |
| 18 Joint pretrial order: | November 14, 2018 | January 18, 2019 |

20 The parties propose these deadlines because they anticipate that discovery in this case will
 21 involve numerous non-parties and a large amount of electronically stored information.

22 Regarding a protocol for electronically stored information and protective orders, the parties
 23 are negotiating these issues and request an additional thirty days to resolve them. The parties
 24 propose to submit a status report on or before June 15, 2018.

25
 26 DATED: May 18, 2018

1 /s/ David C. O'Mara
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